

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



COPY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 5, 2012

Mr. Thomas Taggart, Director
Public Services – Water/Wastewater
City of San Marcos
630 East Hopkins Street
San Marcos, Texas 78666

Re: Compliance with Notice of Violation (NOV) dated August 29, 2011:
City of San Marcos Water System
630 East Hopkins Street, San Marcos (Travis County), Texas
Regulated Entity No. RN101416337, TCEQ Public Water Supply ID 1050001

Dear Mr. Taggart:

This letter is to inform you that the Texas Commission on Environmental Quality (TCEQ) Austin Region Office received adequate compliance documentation on October 14, 2011, to resolve the violations documented during an investigation conducted August 8, 2011. Based on the information submitted, no further action is required concerning this investigation.

The TCEQ appreciates your assistance in this matter and your continued efforts to ensure protection of the public health. Should you have any questions, please feel free to contact Lawrence King at the Austin Region Office at (512) 339-2929.

Sincerely,

A handwritten signature in black ink, appearing to read "Shea Cockrell", written over a horizontal line.

Shea Cockrell
Water Section Work Leader
Austin Region Office

SC/lok

Enclosure: Summary of Investigation



Summary of Investigation Findings

CITY OF SAN MARCOS

Investigation # 976147

Investigation Date: 12/22/2011

, HAYS COUNTY,

Additional ID(s): 1050001

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 444810

30 TAC Chapter 290.43(c)(6)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to maintain a potable water storage tank such that it is thoroughly tight against leakage. Specifically, a leak was discovered on the standpipe at the Comanche Plant. A small spray of water was observed midway up the side of the standpipe.

Investigation: 976147

Comment Date: 12/22/2011

On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with an invoice for the leak repair.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with an invoice for the leak repair.

Track No: 444816

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to maintain a water treatment unit or related appurtenance in a watertight condition. Specifically, a small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is injected into the well discharge line.

Investigation: 976147

Comment Date: 12/22/2011

On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a work order indicating that the leaking water line had been repaired.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a work order indicating that the leaking water line had been repaired.

Track No: 444821

30 TAC Chapter 290.43(c)(8)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to paint and maintain a potable water storage tank in strict accordance with standards of the American Water Works Association. Specifically, the outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded.



On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a photograph of the storage tank effluent line after it had been repainted.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a photograph of the storage tank effluent line after it had been repainted.





PUBLIC SERVICES-WATER/WASTEWATER

October 11, 2011

RECEIVED

OCT 14 2011

**TCEQ FIELD OPERATIONS
AUSTIN REGION 11**

Shea Cockrell
Water Section Work Leader
TCEQ Region 11
2800 South IH-35, Ste. 100
Austin, TX 78704-5700

Re: Notice of Violation for the Comprehensive Compliance Investigation
City of San Marcos, PWS ID 1050001, RN No. RN101416337

Ms. Cockrell:

This letter is to inform you of the corrective actions taken in response to the alleged violations stemming from the Comprehensive Compliance Investigation conducted by Mr. Lawrence King on August 8, 2011.

Alleged Violation: The City failed to maintain a potable water storage tank such that it is thoroughly tight against leakage. Specifically, a leak was discovered on the standpipe at the Comanche Plant. A small spray of water was observed midway up the side of the standpipe.

Corrective Action: Leak was repaired by Texas Aquastore, Inc. on August 25, 2011. The invoice for the work conducted is attached.

Alleged Violation: The City failed to maintain a water treatment unit or related appurtenance in a watertight condition. Specifically, a small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is injected into the well discharge line.

Corrective Action: The leaking fluoride injection quill was removed and the fluoride line valved closed and isolated. The "Unpredicted Maintenance On-site Work Request" completed for this task is attached.

Alleged Violation: The City failed to paint and maintain a potable water storage tank in strict accordance with standards of the American Water Works Association. Specifically, the outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded.



Corrective Action: The effluent line was prepped and painted on October 6, 2011. Before and after photos are attached.

Please contact Jon Clack, Assistant Director of Public Services – Water/Wastewater, at (512) 393-8003 if further information concerning these alleged violations is needed.

Respectfully,



Thomas P. Taggart
Director of Public Services

Cc: Jon Clack, COSM
File



Texas Aquastore, Inc.

PO Box 1965, Pottsboro, TX 75076

Administrative Office

4722 NW Boca Raton Blvd., Suite C-102, Boca Raton, FL 33431

Phone: (561) 994-2400

Fax: 561-994-2444

INVOICE

Date: September 6, 2011

Invoice No: T11.0906-1

To: City of San Marcos
630 Hopkins
San Marcos, TX 78666
Attn: Bert Hendrix

Re: Repair Work

Terms: Net 30

DESCRIPTION:

Leak repair on the Comanche Tank
And Ranch Road 12 Tank

Labor \$ 1,200.00

Per diem \$ 84.00

Motel Exp \$ 280.00

Travel Exp \$ 350.00

Misc. MTS \$ 70.00

Rental EQ \$ 980.00

\$ 2,964.00 US

TOTAL DUE THIS INVOICE \$ 2,964.00 US

FOR YOUR CONVENIENCE YOU MAY WIRE FUNDS PER THE FOLLOWING:

Mellon United National Bank
ABA No. 067009646, Account No. 0221003213
For Credit to Texas Aquastore Inc.



Unpredicted Maintenance
On-Site Work Request

Completed by: LeRoy Garza Completion Date: 8/10/2011

Equipment Description: Fluoride injection quill

Equipment Number: Well-1 Location: Spring Lake

Description of task:

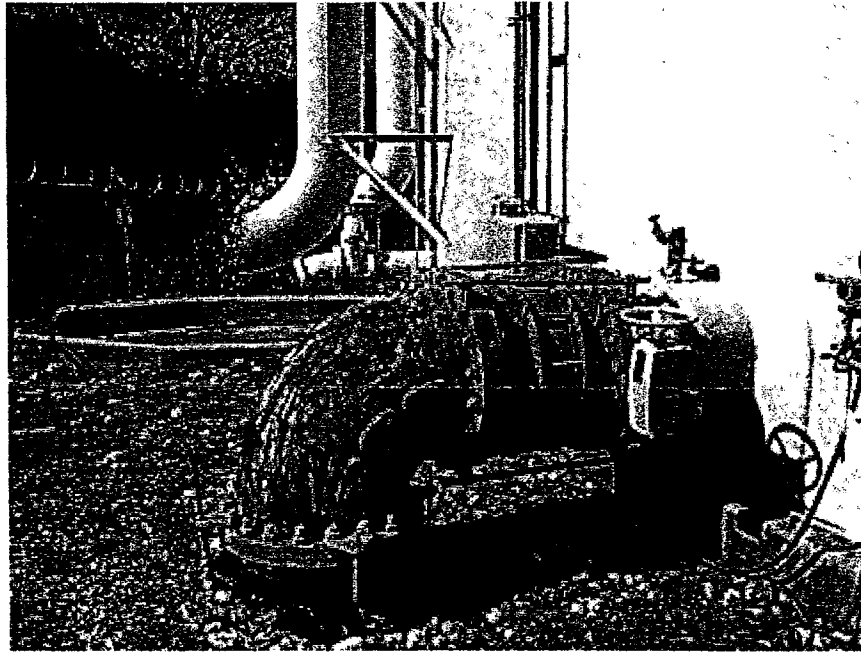
The fluoride injection quill at Well-1 at Springlake
was removed due to it leaking. The valve from
the fluoride line is closed and isolated.

Comments:

Springlake is not injecting fluoride, because we
are providing fluoride from the surface water plant.



City of San Marcos Spring Lake 1.5 MG Storage Tank. Discharge piping painting completed on October 6, 2011.





Texas Commission on Environmental Quality

Investigation Report

City of San Marcos

CN600521272

COPY

CITY OF SAN MARCOS

RN101416337

Investigation # 949183

Incident #

Investigator: LAWRENCE KING

Site Classification

SW >10K CONNECTION

Conducted: 08/08/2011 -- 08/08/2011

SIC Code: 4941

Program(s): PUBLIC WATER
SYSTEM/SUPPLY

Investigation Type : Compliance Investigation

Location : 630 E HOPKINS ST

Additional ID(s) : 1050001

Address: ; ,

Activity Type : REGION 11 - AUSTIN
PWSCCISWCM - PWS CCI SW - CommunityPrincipal(s) :

Role	Name
RESPONDENT	CITY OF SAN MARCOS

Contact(s) :

Role	Title	Name	Phone
Participated in Investigation	ASSISTANT DIRECTOR WATER/WASTEWATER UTILITIES	JON L CLACK	Work (512) 393-8010
Participated in Investigation	CHIEF OPERATOR	JERRY SHARP	Work (512) 353-3888
Participated in Investigation	OPERATOR	MR TONY SALINAS	Work (512) 393-8010
Regulated Entity Contact	DIRECTOR OF PUBLIC SERVICES	MR THOMAS TAGGART	(512) 392-2625 Work (512) 393-8010

Other Staff Member(s) :

Role	Name
Supervisor	SHEA COCKRELL
QA Reviewer	CHAD AHLGREN

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
PWS INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING	San Marcos
PWS STANDARD FIELD	San Marcos

Investigation Comments :

INTRODUCTION

On August 8, 2011, a Comprehensive Compliance Investigation (CCI) was performed of the water system for the City of San Marcos-Public Water Supply ID 1050001. The CCI was conducted by Lawrence King, Environmental Investigator with the TCEQ Austin Region Office. It was scheduled



on July 29, 2011, with Mr. Jon Clack, Assistant Director, Water/Wastewater Services, City of San Marcos, and with Mr. Jerry Sharp, Plant Manager, Guadalupe-Blanco River Authority (GBRA). GBRA operates and jointly owns a surface water treatment plant with the City of San Marcos. The City maintains its own distribution system. Representing the water system during the CCI were Mr. Sharp, Mr. Clack, and Mr. Tony Salinas, Distribution Manager, City of San Marcos. During the CCI, a review was made of the water system's maintenance and operational records, monitoring reports and all other documents required by state or federal regulations for a public water system with a surface water treatment plant. A physical inspection of the water system facilities was also conducted. An exit interview was held with Mr. Clack at the conclusion of the investigation. An Exit Interview Form (copy attached) was provided to him at that time.

GENERAL FACILITY AND PROCESS

In addition to the surface water treatment plant (SWTP), the City of San Marcos has five wells that draw water from the Edwards Aquifer. The SWTP is supplied with water from Lake Dunlap, a reservoir on the Guadalupe River near the City of New Braunfels. The City of San Marcos has 9,992 retail meters, of which 311 are master meters that serve 11,835 living units. There are a total of 21,516 connections. The population is estimated to be 55,940 based on the average household size (2.6) reported in the 2000 census. The City of San Marcos by contract agrees to provide the City of Kyle with up to 500,000 gallons per day of water from the SWTP. The average daily demand for the City of San Marcos during the 12-month period prior to the CCI was 7.066 million gallons (MG). The maximum daily demand during this period was 8.827 MG on October 15, 2010. Two water samples were collected during the investigation. A water sample collected at 1201 Thorpe Lane had a residual disinfectant concentration of 1.58 milligrams per liter (mg/L) of free chlorine. The water pressure at this location was 93 pounds per square inch (psi). A water sample collected at 210 Mimosa Drive had a disinfectant concentration of 1.40 mg/L. The water pressure at this location was 85 psi.

Groundwater

Water from Wells 1 and 2 (Spring Lake Plant-G1050001A and G1050001B) are injected with gaseous chlorine and fluoride prior to entering a 1.5 MG elevated ground storage tank. Four service pumps (three @ 2,200 gpm; one @ 1,865 gpm) take suction from the storage tank and discharge to the distribution system. A small leak was observed on a water line near the point where fluoride is injected into the well discharge line. It was also observed that the outer surface of the effluent line from the storage tank was corroded (see Additional Information below).

Water from Well 5 (Comanche Plant-G1050001D) is injected with gaseous chlorine and fluoride prior to entering a 1.0 MG standpipe. All 1.0 MG are designated as elevated storage. Four service pumps (three @ 600 gpm; one @ 1200 gpm) draw water from the storage tank and discharge to the distribution system, including a 500,000 gallon elevated storage tank on Ranch Road 12. A small leak was observed midway up the side of the standpipe (see Additional Information below).

Water from Well 6 (McCarty Plant-G1050001E) is injected with gaseous chlorine and fluoride prior to entering a 500,000 gallon standpipe. Three 200 gpm service pumps draw water from the standpipe and discharge to the distribution system.

The Soyar Well (G1050001L) discharges to a 270,000 gallon standpipe. Water is injected with gaseous chlorine and fluoride prior to storage. One hundred sixty-one thousand gallons of water from the standpipe are designated as elevated storage. Four service pumps (two @ 600 gpm; two @ 80 gpm) take suction from the standpipe and discharge to the distribution system.

Surface Water

In February 2008, the City of San Marcos/GBRA SWTP was recognized for meeting the criteria of the Texas Optimization Program. The current Concentration Time Study was approved June 13, 2008. The SWTP is rated to produce 21 MGD, 9.0 MGD of which are owned by the City of San Marcos. The clarifiers are the limiting component. There are a total of nine raw water intake pumps at Lake Dunlap (four @ 2,850 gpm; five @ 4,375 gpm). Raw water is transferred via a 20-mile pipeline to the San Marcos SWTP with the aid of an additional pumping station that has five variable



speed 4,000 gpm pumps.

The treatment plant has two trains. It consists of two in-line static mixers, two solids-contact clarifiers (one @ 9 MGD; one @ 12 MGD), two banks of four dual-media gravity filters and two clearwells (1.0 MG and 2.0 MG) that operate in series. Raw water is injected with chlorine dioxide and potassium permanganate (when needed) 3,000 feet upstream of the plant. After entering the plant, water is injected with polyaluminum chloride ahead of the in-line static mixers, then is injected with ferrous chloride and discharged into the upflow clarifiers with tube settlers. Settled water is injected with gaseous chlorine prior to discharging into eight dual-media gravity filters (3 MGD each). Each of the filters and the combined filter effluent line are equipped with a HACH FilterTrak Laser Nephelometer. Filtered water is injected with gaseous chlorine prior to discharging to the clearwells. Water then flows to a transfer well where three 4,166 gpm high service pumps discharge to the distribution system for the City of San Marcos, and two 2,100 gpm high service pumps serve the wholesale connections on the I-35 corridor.

Sludge from the SWTP is transferred to two lagoons and hauled by Magna Flow for wet land application. Backwash water from the filters flows to a third lagoon. As the lagoons fill, the overflow goes into a fourth decant lagoon which can be returned to the head of the plant or used for irrigation.

The Butler Booster Station consists of one 125,000 gallon ground storage tank that is supplied by the SWTP. Four service pumps (two @ 1,700 gpm; one @ 740 gpm; one @ 250 gpm) draw water from storage and discharge to the distribution system.

The water system has three pressure zones. The main pressure plane (PP1) consists of the SWTP, Spring Lake Plant, and the Butler Plant. The upper pressure plane (PP2) consists of the Comanche Plant and the Ranch Road 12 Plant; PP2 is also supplied by PP1 (Spring Lake Tank). The McCarty pressure plane (PP3) consists of the McCarty Plant and the Soyar Plant; PP3 is also supplied by the Ranch Road 12 elevated ground storage tank in PP2. All pressure planes are connected through pressure reducing valves; therefore groundwater and surface water are mixed throughout the system.

The City of San Marcos owns the Oak Ridge Estates water system (PWS ID 1050008) and the Diamond Pure water system (PWS ID 1050087). Both system are connected to the City of San Marcos distribution system but are closed off with valves and are operated independently.

BACKGROUND

Two CCIs were performed in the last five years, on August 8, 2008, and April 30, 2007. No violations were documented during these investigations. One additional issue was noted during the 2007 investigation concerning the service pump capacity. There have been three complaint investigations (one pending at the time of this CCI) in the last five years. To date, no violations have been issued as a result of these investigations. There have been no monitoring violations in the past five years. There are no open or unresolved violations and no enforcement actions have been initiated against the City's water system in the last five years.

ADDITIONAL INFORMATION

The City of San Marcos water system is being operated and maintained in a manner that continues to deserve a superior rating. GBRA and the City of San Marcos staff have demonstrated a clear understanding of the operations and maintenance of the system. Records were well maintained and available for review.

As noted above, a small leak was discovered on the standpipe at the Comanché Plant. A small spray of water was observed midway up the side of the standpipe. A violation of 30 Texas Administrative Code 290.43(c)(6) will be cited for failure to maintain a potable water storage tank such that it is thoroughly tight against leakage.

A small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is



injected into the well discharge line. A violation of 30 Texas Administrative Code 290.46(m)(4) will be cited for failure to maintain a water treatment unit or related appurtenance in a watertight condition.

The outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded. A violation of 30 Texas Administrative Code 290.43(c)(8) will be cited for failure to paint and maintain the storage tank in strict accordance with standards of the American Water Works Association. These violations will be included in a Notice of Violation dated August, 29, 2011.

Two additional issues were noted during the CCI. Water conservation measures in the City's drought contingency plan are triggered by the level of the Edwards Aquifer but not by conditions on the Guadalupe River or Lake Dunlap, which is the source of water for the surface water treatment plant. It is recommended that the City consider revising its drought contingency plan to also include triggers related to water availability from Lake Dunlap.

It is estimated, based on the reported connection count, and the 500,000 gallon a day commitment to the City of Kyle, and on the current well production rates, that the City of San Marcos is within 77 percent of its total water production capacity. If the City is not already doing so, it is recommended that it begin planning how it will meet future water production demands.

NOV Date	Method
08/29/2011	WRITTEN

OUTSTANDING ALLEGED VIOLATION(S)
ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 444810 Compliance Due Date: 10/28/2011
Violation Start Date: Unknown

30 TAC Chapter 290.43(c)(6)

Alleged Violation:

Investigation: 949183

Comment Date: 08/22/2011

The City failed to maintain a potable water storage tank such that it is thoroughly tight against leakage. Specifically, a leak was discovered on the standpipe at the Comanche Plant. A small spray of water was observed midway up the side of the standpipe.

Recommended Corrective Action: The City shall repair the leak on the standpipe at the Comanche plant and submit documentation to the TCEQ Austin Region Office which demonstrates that the work has been completed.

Track No: 444816 Compliance Due Date: 10/28/2011
Violation Start Date: Unknown

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 949183

Comment Date: 08/22/2011

The City failed to maintain a water treatment unit or related appurtenance in a watertight condition. Specifically, a small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is injected into the well discharge line.

Recommended Corrective Action: The City shall repair the leaking water line at the Spring Lake Plant and submit documentation to the Austin Region Office demonstrating that the work has been completed.



Track No: 444821

Compliance Due Date: 10/28/2011

Violation Start Date: Unknown

30 TAC Chapter 290.43(c)(8)

Alleged Violation:

Investigation: 949183

Comment Date: 08/22/2011

The City failed to paint and maintain a potable water storage tank in strict accordance with standards of the American Water Works Association. Specifically, the outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded.

Recommended Corrective Action: The City shall recoat the outer surface of the effluent line and submit documentation, such as a photograph, to the Austin Region Office which demonstrates that the work has been completed.

Additional Issues**Description** Item 4**Additional Comments**

Water conservation measures in the City's drought contingency plan are triggered by the level of the Edwards Aquifer but not by conditions on the Guadalupe River or Lake Dunlap, which is the source of water for the surface water treatment plant. It is recommended that the City consider revising its drought contingency plan to also include triggers related to water availability from Lake Dunlap.

Description Item 5**Additional Comments**

It is estimated, based on the reported connection count, and the 500,000 gallon a day commitment to the City of Kyle, and on the current well production rates, that the City of San Marcos is within 77 percent of its total water production capacity. If the City is not already doing so, it is recommended that it begin planning how it will meet future water production demands.

Signed Lawrence V. [Signature]
Environmental Investigator

Date 8-23-2011

Signed [Signature]
Supervisor

Date 08/25/2011



Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : NOR 8-29-2011

☐ Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ NOR

☒ Maps, Plans, Sketches

☐ Photographs

☐ Correspondence from the facility

☒ Other (specify) :

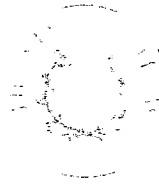
Net data sheet

WUD data sheet

Exit Interview Form



Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



COPY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 29, 2011

CERTIFIED MAIL 91 7108 2133 3935 2006 4649
RETURN RECEIPT REQUESTED

Mr. Thomas Taggart, Director
Public Services – Water/Wastewater
City of San Marcos
630 East Hopkins Street
San Marcos, Texas 78666

Re: Notice of Violation for the Comprehensive Compliance Investigation at:
City of San Marcos Water System
630 East Hopkins Street, San Marcos (Travis County), Texas
Regulated Entity No. RN101416337, TCEQ Public Water Supply ID 1050001

Dear Mr. Taggart:

On August 8, 2011, Lawrence King of the Texas Commission on Environmental Quality (TCEQ) Austin Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public drinking water systems. Enclosed is a summary which lists the investigation findings. During the investigation, certain alleged violations were identified for which compliance documentation is required. Please submit to this office by **October 28, 2011**, a written description of corrective actions taken and the required documentation demonstrating that compliance has been achieved.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Austin Region Office region Office at 512-339-2929 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with

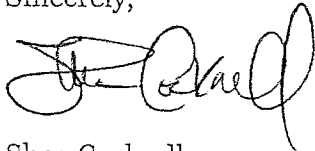


Mr. Thomas Taggart
August 29, 2011
Page 2

environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to continue to protect the public health. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify the Austin Region Office within 10 days from the date of this letter. At that time, I will schedule a violation review meeting to be conducted *within 21 days from the date of this letter*. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of the contested violations.

If you or members of your staff have any questions, please feel free to contact Mr. King in the Austin Region Office at 512-339-2929.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shea Cockrell', written over a horizontal line.

Shea Cockrell
Water Section Work Leader
Austin Region Office

SC/lok

Enclosures: Summary of Investigation Findings



Summary of Investigation Findings

CITY OF SAN MARCOS

Investigation # 949183

, HAYS COUNTY,

Investigation Date: 08/08/2011

Additional ID(s): 1050001

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 444810 Compliance Due Date: 10/28/2011
30 TAC Chapter 290.43(c)(6)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to maintain a potable water storage tank such that it is thoroughly tight against leakage. Specifically, a leak was discovered on the standpipe at the Comanche Plant. A small spray of water was observed midway up the side of the standpipe.

Recommended Corrective Action: The City shall repair the leak on the standpipe at the Comanche plant and submit documentation to the TCEQ Austin Region Office which demonstrates that the work has been completed.

Track No: 444816 Compliance Due Date: 10/28/2011
30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to maintain a water treatment unit or related appurtenance in a watertight condition. Specifically, a small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is injected into the well discharge line.

Recommended Corrective Action: The City shall repair the leaking water line at the Spring Lake Plant and submit documentation to the Austin Region Office demonstrating that the work has been completed.

Track No: 444821 Compliance Due Date: 10/28/2011
30 TAC Chapter 290.43(c)(8)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to paint and maintain a potable water storage tank in strict accordance with standards of the American Water Works Association. Specifically, the outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded.

Recommended Corrective Action: The City shall recoat the outer surface of the effluent line and submit documentation, such as a photograph, to the Austin Region Office which demonstrates that the work has been completed.

ADDITIONAL ISSUES

Description

Additional Comments



Item 4

Water conservation measures in the City's drought contingency plan are triggered by the level of the Edwards Aquifer but not by conditions on the Guadalupe River or Lake Dunlap, which is the source of water for the surface water treatment plant. It is recommended that the City consider revising its drought contingency plan to also include triggers related to water availability from Lake Dunlap.

Item 5

It is estimated, based on the reported connection count, and the 500,000 gallon a day commitment to the City of Kyle, and on the current well production rates, that the City of San Marcos is within 77 percent of its total water production capacity. If the City is not already doing so, it is recommended that it begin planning how it will meet future water production demands.



Texas Commission on Environmental Quality

Investigation Report

City of San Marcos
CN600521272

COPY

CITY OF SAN MARCOS

RN101416337

Investigation # 976147

Incident #

Investigator: LAWRENCE KING

Site Classification

SW >10K CONNECTION

Conducted: 12/22/2011 -- 12/22/2011

SIC Code: 4941

Program(s): PUBLIC WATER
SYSTEM/SUPPLY

Investigation Type : Compliance Invest File Review

Location : 630 E HOPKINS ST

Additional ID(s) : 1050001

Address: ; ,

Activity Type : REGION 11 - AUSTIN

PWSFRR - PWS NOV Record Review

Principal(s) :

Role	Name
RESPONDENT	CITY OF SAN MARCOS

Contact(s) :

Role	Title	Name	Phone
Regulated Entity Contact	DIRECTOR OF PUBLIC SERVICES	MR THOMAS TAGGART	(512) 392-2625 Work (512) 393-8010

Other Staff Member(s) :

Role	Name
Supervisor	SHEA COCKRELL

Associated Check List

Checklist Name

GENERIC OTHER ISSUES AND/OR VIOLATIONS

Unit Name

City of San Marcos

Investigation Comments :

INTRODUCTION

A Compliance Investigation File Review was conducted on December 22, 2011, as a follow up to a Comprehensive Compliance Investigation (CCI) performed on August 8, 2011, of the water system for the City of San Marcos-Public Water Supply ID 1050001. The CCI and file review were conducted by Lawrence King, Environmental Investigator with the TCEQ Austin Region Office. Representing the City during the CCI were Mr. Jon Clack, Assistant Director, Water/Wastewater Services, Mr. Tony Salinas, Distribution Manager, City of San Marcos, and Mr. Jerry Sharp, Plant Manager, Guadalupe-Blanco River Authority (GBRA). GBRA operates and jointly owns a surface water treatment plant with the City of San Marcos. The City maintains its own distribution system. During the CCI, a review was made of the water system's records and a physical inspection of the water system facilities was performed. An exit interview was held with Mr. Clack at the conclusion of the investigation. An Exit Interview Form was provided to him at that time.



BACKGROUND

During the CCI, a small leak was discovered on the standpipe at the Comanche Plant. A violation of 30 Texas Administrative Code 290.43(c)(6) was cited for failure to maintain a potable water storage tank such that it is thoroughly tight against leakage.

A small leak was observed at the Spring Lake Plant on a water line near the fluoride injection line. A violation of 30 Texas Administrative Code 290.46(m)(4) was cited for failure to maintain a water treatment unit or related appurtenance in a watertight condition.

The outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded. A violation of 30 Texas Administrative Code 290.43(c)(8) was cited for failure to paint and maintain the storage tank in strict accordance with standards of the American Water Works Association.

ADDITIONAL INFORMATION

On October 14, 2011, a letter (attached) was received in the Austin Region Office from the City of San Marcos with documentation which demonstrates that the violations had been corrected. A letter of compliance will be mailed to the City on January 5, 2012.

ALLEGED VIOLATION(S) NOTED AND RESOLVED**Track No:** 444810**Resolution Status Date:** 12/22/2011**Violation Start Date:** Unknown**Violation End Date:** 10/14/2011**30 TAC Chapter 290.43(c)(6)****Alleged Violation:****Investigation:** 949183**Comment Date:** 08/22/2011

The City failed to maintain a potable water storage tank such that it is thoroughly tight against leakage. Specifically, a leak was discovered on the standpipe at the Comanche Plant. A small spray of water was observed midway up the side of the standpipe.

Investigation: 976147**Comment Date:** 12/22/2011

On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with an invoice for the leak repair.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with an invoice for the leak repair.

Track No: 444816**Resolution Status Date:** 12/22/2011**Violation Start Date:** Unknown**Violation End Date:** 10/14/2011**30 TAC Chapter 290.46(m)(4)****Alleged Violation:****Investigation:** 949183**Comment Date:** 08/22/2011

The City failed to maintain a water treatment unit or related appurtenance in a watertight condition. Specifically, a small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is injected into the well discharge line.

Investigation: 976147**Comment Date:** 12/22/2011

On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a work order indicating that the leaking water line had been repaired.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of



San Marcos with a work order indicating that the leaking water line had been repaired.

Track No: 444821

Resolution Status Date: 12/22/2011

Violation Start Date: Unknown Violation End Date: 10/14/2011

30 TAC Chapter 290.43(c)(8)

Alleged Violation:

Investigation: 949183

Comment Date: 08/22/2011

The City failed to paint and maintain a potable water storage tank in strict accordance with standards of the American Water Works Association. Specifically, the outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded.


Investigation: 976147

Comment Date: 12/22/2011

On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a photograph of the storage tank effluent line after it had been repainted.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a photograph of the storage tank effluent line after it had been repainted.

Signed


Environmental Investigator

Date 12-29-2011

Signed


Supervisor

Date 01/03/2012

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☐ Maps, Plans, Sketches

☒ Letter to Facility (specify type) : compliance

☐ Photographs

☐ Investigation Report

01-05-2012

☒ Correspondence from the facility

☐ Sample Analysis Results

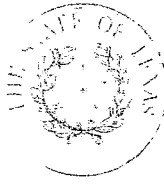
☐ Other (specify) :

☐ Manifests

☐ NOR



Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



COPY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 5, 2012

Mr. Thomas Taggart, Director
Public Services – Water/Wastewater
City of San Marcos
630 East Hopkins Street
San Marcos, Texas 78666

Re: Compliance with Notice of Violation (NOV) dated August 29, 2011:
City of San Marcos Water System
630 East Hopkins Street, San Marcos (Travis County), Texas
Regulated Entity No. RN101416337, TCEQ Public Water Supply ID 1050001

Dear Mr. Taggart:

This letter is to inform you that the Texas Commission on Environmental Quality (TCEQ) Austin Region Office received adequate compliance documentation on October 14, 2011, to resolve the violations documented during an investigation conducted August 8, 2011. Based on the information submitted, no further action is required concerning this investigation.

The TCEQ appreciates your assistance in this matter and your continued efforts to ensure protection of the public health. Should you have any questions, please feel free to contact Lawrence King at the Austin Region Office at (512) 339-2929.

Sincerely,

A handwritten signature in black ink, appearing to read "Shea Cockrell", written over a horizontal line.

Shea Cockrell
Water Section Work Leader
Austin Region Office

SC/lok

Enclosure: Summary of Investigation



Summary of Investigation Findings

CITY OF SAN MARCOS

Investigation # 976147

, HAYS COUNTY,

Investigation Date: 12/22/2011

Additional ID(s): 1050001

ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 444810

30 TAC Chapter 290.43(c)(6)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to maintain a potable water storage tank such that it is thoroughly tight against leakage. Specifically, a leak was discovered on the standpipe at the Comanche Plant. A small spray of water was observed midway up the side of the standpipe.

Investigation: 976147

Comment Date: 12/22/2011

On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with an invoice for the leak repair.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with an invoice for the leak repair.

Track No: 444816

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to maintain a water treatment unit or related appurtenance in a watertight condition. Specifically, a small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is injected into the well discharge line.

Investigation: 976147

Comment Date: 12/22/2011

On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a work order indicating that the leaking water line had been repaired.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a work order indicating that the leaking water line had been repaired.

Track No: 444821

30 TAC Chapter 290.43(c)(8)

Alleged Violation:

Investigation: 949183

Comment Date: 8/22/2011

The City failed to paint and maintain a potable water storage tank in strict accordance with standards of the American Water Works Association. Specifically, the outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded.



On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a photograph of the storage tank effluent line after it had been repainted.

Resolution: On October 14, 2011, a letter was received in the Austin Region Office from the City of San Marcos with a photograph of the storage tank effluent line after it had been repainted.





PUBLIC SERVICES-WATER/WASTEWATER

October 11, 2011

RECEIVED

OCT 14 2011

**TCEQ FIELD OPERATIONS
AUSTIN REGION 11**

Shea Cockrell
Water Section Work Leader
TCEQ Region 11
2800 South IH-35, Ste. 100
Austin, TX 78704-5700

Re: Notice of Violation for the Comprehensive Compliance Investigation
City of San Marcos, PWS ID 1050001, RN No. RN101416337

Ms. Cockrell:

This letter is to inform you of the corrective actions taken in response to the alleged violations stemming from the Comprehensive Compliance Investigation conducted by Mr. Lawrence King on August 8, 2011.

Alleged Violation: The City failed to maintain a potable water storage tank such that it is thoroughly tight against leakage. Specifically, a leak was discovered on the standpipe at the Comanche Plant. A small spray of water was observed midway up the side of the standpipe.

Corrective Action: Leak was repaired by Texas Aquastore, Inc. on August 25, 2011. The invoice for the work conducted is attached.

Alleged Violation: The City failed to maintain a water treatment unit or related appurtenance in a watertight condition. Specifically, a small leak was observed at the Spring Lake Plant on a water line near the point where fluoride is injected into the well discharge line.

Corrective Action: The leaking fluoride injection quill was removed and the fluoride line valved closed and isolated. The "Unpredicted Maintenance On-site Work Request" completed for this task is attached.

Alleged Violation: The City failed to paint and maintain a potable water storage tank in strict accordance with standards of the American Water Works Association. Specifically, the outer surface of the effluent line for the 1.5 MG storage tank at the Spring Lake Plant was corroded.

